UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

CHARIN DAVENPORT

Plaintiff,

Case No. 2:16-cv-11289

V

Hon. Sean F. Cox

SAGINAW VALLEY STATE UNIVERSITY; and ANN COBURN-COLLINS, in her individual and official capacity, Mag. Judge David R. Grand

Defendants.

Jennifer B. Salvatore (P66640)
Sarah S. Prescott (P70510)
SALVATORE PRESCOTT
& PORTER, PLLC
Attorneys for Plaintiff
105 East Main Street
Northville, MI 48167
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Jamie Hecht Nisidis (P48969) Braun Kendrick Finkbeiner PLC Attorney for Defendant 4301 Fashion Square Boulevard Saginaw, MI 48603 (989) 498-2100 jamnis@braunkendrick.com

PLAINTIFF'S WITNESS LIST

NOW COMES Plaintiff, CHARIN DAVENPORT, by and through her attorneys, SALVATORE PRESCOTT & PORTER, PLLC, and hereby identifies the following potential witnesses who she may call to testify at trial:

A. Expert Witnesses

None

B. Fact Witnesses

(1) **Charin Davenport**

c/o Salvatore Prescott & Porter, PLLC 105 E. Main Street. Northville, MI

Phone: (248) 679-8711

Ms. Davenport may testify about all of the allegations alleged in her complaint. She will also testify regarding damages and about emotional distress stemming from her termination.

(2) **Joanna Hill**

23304 Cayuga Ave. Hazel Park, MI 48030 (248) 765-3599 jhill28590@comcast.net

Ms. Hill may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(3) Rachel Crandall-Crocker

Executive Director, Transgender Michigan *Address unknown*Ferndale, MI
(515) 420-1544

Ms. Crandall-Crocker may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(4) Michelle Fox-Phillips

Executive Director Gender Identity Network Alliance Address unknown Detroit, MI (248) 514-2688

Ms. Fox-Phillips may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(5) **Jayne Locke**

Address unknown Howell, MI (517) 881-7749

Ms. Locke may testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(6) **AJ Trager**

Address unknown Ypsilanti, MI (734) 293-7200 AJ Trager may testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(7) **Amy Lynn Smith**

Address unknown Birmingham, MI (248) 643-7920

Ms. Smith may testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(8) Susan Deford

Administrative Assistant, English Dept. Delta College 1961 Delta Rd. University Center, MI 48710 (989) 686-9159

Ms. Deford may testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(9) **Denise Hill**

Chair, English Division Delta College 1961 Delta Rd. University Center, MI 48710 (989) 686-9159 Ms. Hill may testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(10) Betsy Christensen

2493 N Quail Run Dr. Midland, MI 48642 Home: (989)832-9123

Work: (989)686-9199

Ms. Christensen, English Instructor at Delta College, may testify regarding her interactions with Plaintiff and with Defendant Ann Coburn-Collins. She may also testify regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(11) Kathie Marchlewski

393 River Drive Kawkawlin, MI 48706 (989) 280-6765

Ms. Marchlewski may testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(12) **John Baesler, Ph.D.**

Associate Professor of History Department of History Saginaw Valley State University Brown Hall 332 7400 Bay Road University Center, MI 48710 (989) 964-4381 Dr. Baesler, Associate Professor of History at SVSU, may testify regarding the allegations alleged in Plaintiff's complaint. He may testify regarding his interactions with Plaintiff and with others concerning Plaintiff. Dr. Baesler may also testify regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination and more generally about the employment environment at Defendant SVSU.

(13) **Bill Williamson, Ph.D.**

Associate Professor & Department Chair, Department of Rhetoric & Professional Writing Saginaw Valley State University Zahnow 221 7400 Bay Road University Center, MI 48710 (989) 964-4625

Dr. Williamson, Associate Professor and Chair, Department of Rhetoric and Professional Writing, may testify regarding his interactions with Plaintiff, and with others concerning Plaintiff. Dr. Williamson may also testify regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination and more generally about the employment environment at Defendant SVSU.

(14) Sherrin Frances, Ph.D.

Associate Professor of English Department of English Saginaw Valley State University Brown Hall 356 7400 Bay Road University Center, MI 48710 (989) 964-6068

Dr. Frances, Associate Professor of English, may testify regarding her interactions with Plaintiff, and with others concerning Plaintiff. She may also testify more generally about the employment environment at Defendant SVSU.

(15) **Jennifer Shores**

Address unknown Washington, MI (989) 549-1253 jlshores@svsu.edu

Ms. Shores may testify regarding her interactions with Plaintiff, with Defendant Ann Coburn-Collins, and with others concerning Plaintiff.

Ms. Shores may also testify regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(16) **Eric Welsby**

Address unknown Flushing, MI (810) 730-5711

Mr. Welsby may testify regarding his interactions with Plaintiff and with others concerning Plaintiff, and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(17) **Tyler Bradley**

Address unknown (810) 404-1692

Mr. Bradley may testify regarding the allegations alleged in Plaintiff's complaint. He may also testify regarding his interactions with Plaintiff and with others concerning Plaintiff. Furthermore, Mr. Bradley may testify regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination and more generally about the employment environment at Defendant SVSU.

(18) Shane Carter

Address unknown (989) 423-3293

Mr. Carter may testify regarding the allegations alleged in Plaintiff's complaint. He may also testify regarding his interactions with Plaintiff, and with Defendant Ann Coburn-Collins, and more generally about the campus environment at Defendant SVSU.

(19) Ari Gottleber

Address unknown (989) 245-2354

Mr. Gottleber may testify regarding the allegations alleged in Plaintiff's complaint. He may also testify regarding his interactions with Plaintiff, with others concerning Plaintiff, and regarding his interactions with Defendant Ann Coburn-Collins. Furthermore, he may testify regarding damages and harm experienced by Plaintiff stemming from Plaintiff's

termination and more generally about the campus environment at Defendant SVSU.

(20) Hillary Glasby

Address & phone number unknown

Ms. Glasby may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination. Furthermore, she may testify more generally about the employment environment at Defendant SVSU.

(21) Amelia Glebocki

St. Clair Shores, MI (313) 300-4611

Ms. Glebocki may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(22) Gillan White

Saginaw Valley State University Brown Hall 229 7400 Bay Road University Center, MI 48710 (989) 859-7510 gdwhite1@svsu.edu Ms. White, Director of the Reading Program at SVSU, may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff, with Defendant Ann Coburn-Collins, and with others concerning Plaintiff. She may also testify regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination and more generally about the employment environment at Defendant SVSU.

(23) Pat Cavanaugh, Ph.D.

Writing Program Administrator Saginaw Valley State University 7400 Bay Road University Center, MI 48710 (989) 964-4022 mpc@svsu.edu

Dr. Cavanaugh, Writing Program Administrator at SVSU, may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff, with others concerning Plaintiff, and regarding her interactions with Defendant Ann Coburn-Collins. Dr. Cavanaugh may also testify regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination and more generally about the employment environment at Defendant SVSU.

(24) Sarah Dickerson

1370 Lake Michigan Dr. NW Grand Rapids, MI 49534 (616) 240-0805

Ms. Dickerson, Plaintiff's ex-wife, may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(25) Emily Davenport

34 Manzana Ct., Apt. 1A Grand Rapids, MI 49534 (616) 589-8580

Ms. Davenport, Plaintiff's daughter, may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(26) James Davenport

1202 Borton Ave. Essexville, MI 48732 (989) 316-5417

Mr. Davenport, Plaintiff's brother, may testify regarding the allegations alleged in Plaintiff's complaint. He may also testify regarding his interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(27) Caitlyn Diana Laufey

816 W Shiawassee St. Lansing, MI 48915 (517) 414-3189 laufeysdatter@gmail.com

Ms. Laufey may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(28) Amy Hunter

8979 W F Ave. Kalamazoo, MI 49009 (269) 720-9329 (Cell) (269) 372-0095 (Home) amy.hunter@gmail.com

Ms. Hunter may testify regarding the allegations alleged in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and regarding damages and harm experienced by Plaintiff stemming from Plaintiff's termination.

(29) **Donald J. Bachand, Ph.D.**

c/o Jamie Hecht Nisidis Braun Kendrick Finkbeiner, P.L.C. 4301 Fashion Square Blvd. Saginaw, MI 48603

Dr. Bachand may testify regarding the allegations alleged in Plaintiff's complaint. He may also testify regarding his interactions with Defendant Ann Coburn-Collins.

(30) **Deborah Rickert**

c/o Jamie Hecht Nisidis Braun Kendrick Finkbeiner, P.L.C. 4301 Fashion Square Blvd. Saginaw, MI 48603

Ms. Rickert, Office Coordinator in Academic Program Support at SVSU, may testify regarding the allegations alleged in Plaintiff's complaint. She may testify regarding her interactions with Plaintiff, with Defendant Ann Coburn-Collins, and her interactions with others concerning Plaintiff or Defendant Ann Coburn-Collins. Furthermore, Ms. Rickert may testify regarding interactions between Plaintiff and Defendant to which she was a witness.

(31) Jack VanHoorelbeke, Esq.

c/o Jamie Hecht Nisidis Braun Kendrick Finkbeiner, P.L.C. 4301 Fashion Square Blvd. Saginaw, MI 48603

Mr. VanHoorelbeke may testify regarding the allegations in Plaintiff's complaint. He may also testify regarding his interactions with Plaintiff, and with others concerning Plaintiff.

(32) Joni Boye-Beaman

c/o Jamie Hecht Nisidis Braun Kendrick Finkbeiner, P.L.C. 4301 Fashion Square Blvd. Saginaw, MI 48603 Ms. Joni Boye-Beaman may testify regarding the allegations in Plaintiff's complaint. She may also testify regarding her interactions with others concerning Plaintiff.

(33) **Gary Thompson**

c/o Jamie Hecht Nisidis Braun Kendrick Finkbeiner, P.L.C. 4301 Fashion Square Blvd. Saginaw, MI 48603

Mr. Thompson may testify regarding the allegations in Plaintiff's complaint. He may also testify regarding his interactions with others concerning Plaintiff.

(34) LaDonna Young

c/o Jamie Hecht Nisidis Braun Kendrick Finkbeiner, P.L.C. 4301 Fashion Square Blvd. Saginaw, MI 48603

Ms. Young may testify regarding the allegations in Plaintiff's complaint. She may also testify regarding her interactions with Plaintiff and her interactions with others concerning Plaintiff.

(35) Edward M. Langham, LMSW

Last known contact information: 3521 State St.
Saginaw, MI 48602
(989) 791-3756

Mr. Langham may testify regarding emotional distress Plaintiff experienced as a result of her termination by Defendant, the counseling he provided Plaintiff and why the treatment was necessary.

(36) Cheryl A. Eurton, Ph.D.

Last known contact information: Aleda E. Lutz Veterans Affairs Medical Center 1500 Weiss St. Saginaw, MI 48602 (989) 497-2500 Ext. 11769

Dr. Eurton may testify regarding emotional distress Plaintiff experienced as a result of her termination by Defendant, the counseling she provided Plaintiff and why the treatment was necessary.

(37) Kimberly Gourlay, MHC, LMSW

Aleda E. Lutz Veterans Affairs Medical Center 1500 Weiss St. Saginaw, MI 48602 (989) 497-2500

Ms. Gourlay may testify regarding emotional distress Plaintiff experienced as a result of her termination by Defendant, the counseling she provided Plaintiff and why the treatment was necessary.

- (38) Treating and consulting physicians and health care providers; representative/keeper of records; and current and/or former employees of VA Medical Centers.
- (39) Representatives/keepers of records and current and/or former employees of Saginaw Valley State University.

- (40) Representatives/keepers of records and current and/or former employees of Oakland University.
- (41) Any and all witnesses identified by Defendants.
- (42) Any and all necessary rebuttal witnesses.
- (43) Any and all necessary expert witnesses and/or rebuttal expert witnesses.
- (44) Any and all witnesses necessary to authenticate, interpret, identify and/or introduce exhibits.
- (45) Any witnesses currently unknown but disclosed through discovery.
- (46) Plaintiff reserves the right to name additional witnesses that may become known subsequent to the filing of this witness list.
- (47) Plaintiff reserves the right to call only such persons they deem necessary at trial.

Respectfully submitted,

SALVATORE PRESCOTT & PORTER, PLLC

Date: December 22, 2016 /s/ Jennifer B. Salvatore

Jennifer B. Salvatore (P66640) Sarah S. Prescott (P70510) Attorneys for Plaintiff 105 East Main Street Northville, MI 48167 (248) 679-8711 salvatore@spplawyers.com prescott@spplawyers.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served upon all parties to the above cause to each of the attorneys/parties of record herein by electronic filing on the 22^{nd} day of December 2016.

/s/ Jennifer B. Salvatore